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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
OAKLAND DIVISION

UNITED STATES OF AMERICA,)	CASE NO. 4:24-CR-00033-HSG
Plaintiff,)	
v.)	STIPULATION TO EXCLUDE TIME UNDER
)	THE SPEEDY TRIAL ACT AND ORDER
EDUARDO PONCE,)	
Defendant.)	

It is hereby stipulated by and between counsel for the United States and counsel for the defendant Eduardo Ponce, that time be excluded under the Speedy Trial Act from April 17, 2024 through May 22, 2024.

At the status conference held on April 22, 2024, the government and counsel for the defendant agreed that time be excluded under the Speedy Trial Act so that defense counsel could continue to prepare, including by reviewing the discovery already produced. Specifically, exclusion of time will allow defense counsel to further review discovery materials produced by the government, to consult with government counsel on additional requests for discovery, and to engage in plea discussions. For these reasons and as further stated on the record at the status conference, the parties stipulate and agree that excluding time until May 22, 2024 will allow for the effective preparation of counsel. *See* 18

STIP. TO EXCLUDE TIME UNDER THE SPEEDY TRIAL ACT AND ORDER
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U.S.C. § 3161(h)(7)(B)(iv). The parties further stipulate and agree that the ends of justice served by excluding the time from April 17, 2024 through May 22, 2024 from computation under the Speedy Trial Act outweigh the best interests of the public and the defendant in a speedy trial. 18 U.S.C. § 3161(h)(7)(A), (B)(iv).

The undersigned Assistant United States Attorney certifies that he has obtained approval from counsel for the defendant to file this stipulation and proposed order.

IT IS SO STIPULATED.

DATED: May 7, 2024

/s/ Michael G. Lagrama
MICHAEL G. LAGRAMA
Assistant United States Attorney

DATED: May 7, 2024

/s/ Karen McConville
KAREN McCONVILLE
Counsel for Defendant Eduardo Ponce

ORDER

Based upon the facts set forth in the stipulation of the parties and the representations made to the Court on April 17, 2024 and for good cause shown, the Court finds that failing to exclude the time from April 17, 2024 through May 22, 2024 would unreasonably deny defense counsel and the defendant the reasonable time necessary for effective preparation, taking into account the exercise of due diligence 18 U.S.C. § 3161(h)(7)(B)(iv). The Court further finds that the ends of justice served by excluding the time from April 17, 2024 through May 22, 2024 from computation under the Speedy Trial Act outweigh the best interests of the public and the defendant in a speedy trial. Therefore, and with the consent of the parties, IT IS HEREBY ORDERED that the time from April 17, 2024 through May 22, 2024 shall be excluded from computation under the Speedy Trial Act. 18 U.S.C. § 3161(h)(7)(A), (B)(iv).

IT IS SO ORDERED.

DATED: 5/8/2024

Haywood S. Gilliam, Jr.
HON. HAYWOOD S. GILLIAM, JR.
United States District Judge